SQUIRE SANDERS

Squire Sanders (US) LLP
1200 19th Street, NW
Suite 300
Washington, DC 20036

O +1 202 626 6600
F +1 202 626 6780
squiresanders.com

Bruce A. Olcott
T +1.202.626.6615
bruce.olcott@squiresanders.com

August 20, 2012

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Cellphone-Mate Inc. and Powerful Signal LLC
Permitted Oral *Ex Parte* Presentation
WT Docket No. 10-4

Dear Ms. Dortch:

On August 16, 2012, representatives of Cellphone-Mate Inc. and Powerful Signal LLC participated in a conference call with representatives of the Commission staff to discuss the above referenced proceeding. Participating in the meeting were Tom Derenge, Moslem Sawez and Becky Schwartz of the Wireless Telecommunications Bureau. Also participating in the meeting were Hongtao Zhan, Chairman and CEO of Cellphone-Mate; Kevin Taylor, President of Powerful Signal; and the undersigned.

The focus of the discussion was the Commission's rules for enterprise signal boosters used by small, medium and large businesses and industry, along with numerous government agencies and institutions, such as universities, hospitals, office buildings, warehouses, power plants, dams and parking facilities. Enterprise signal boosters provide a critical resource to enable wireless broadband connectivity for employees and customers inside structures that often lack reliable access to cellular networks. Many businesses and agencies upon discovering that they lack reliable wireless service inside their facilities seek the installation of a signal booster system in order to remedy the problem as quickly as possible. Further, such businesses and agencies invariably seek the installation of a wideband signal booster system to enable access to all wireless networks that may be used by employees and customers in the building.

Companies such as Cellphone-Mate manufacture high quality signal boosters specifically for this purpose and companies such as Powerful Signal custom design installations for this equipment that take into account the needs of the building owner, the signal propagation

characteristics of the structure, and the proximity and availability of base stations for each of the wireless networks. As a result, enterprise signal booster installations are rarely the source of complaints of harmful interference to wireless networks and, in the rare instances when issues do arise, they are immediately corrected.

Despite the critical importance of enterprise signal boosters to ensure wireless broadband connectivity for businesses, industry and government, the major wireless carriers have not embraced enterprise signal boosters as beneficial to their services or to their customers. Instead, the major carriers often object to the installation of such systems by independent companies, or are extremely slow in providing approval for such installations, if such approval is provided at all. In our experience, the carriers only approve installations of narrowband booster equipment designed to operate with a single wireless service, even though enterprise customers routinely desire and require wideband capabilities supporting each of the major wireless carriers. The process of attempting to secure approval from wireless carriers for the installation of narrowband equipment routinely exceeds a year, far longer than most customers are willing to wait for wireless connectivity solutions. For these reasons, most enterprise signal booster installations are professionally designed and installed without the cooperation or consent of the wireless carriers.

Certain of the wireless carriers offer their own enterprise signal booster solutions, but these systems are designed to boost the signals of only one wireless carrier and routinely cost exponentially more than wideband systems made available by independent manufacturers and system providers. The high costs of carrier sponsored systems normally exceed what most businesses, institutions and government agencies are able to afford, greatly limiting the use of such systems to enable wireless broadband connectivity.

Given these factors, the Cellphone-Mate and Powerful Signal representatives urged the Commission to act with restraint in adopting new rules for the installation and use of signal boosters. Although new requirements may be needed to ensure that mass-marketed signal boosters designed for the consumer market do not cause harmful interference to wireless networks, some of these same requirements are not suitable for professionally provided enterprise signal booster equipment. For example, the Commission should require that all signal boosters, including those designed for the enterprise market, employ automatic shutdown capabilities, but the power level restrictions of enterprise signal boosters should not be as stringent as those for consumer boosters, which are not subject to professional installation.

Of particular concern is the possibility that the Commission might require professional providers of enterprise signal boosters to secure the consent of every wireless carrier that would potentially be covered by the signal booster system. Such a requirement could prevent most companies from enjoying the benefits of reliable broadband connectivity in their facilities for their employees and customers. Carriers would have a strong incentive to withhold or delay the provision of such consent, favoring instead their own overpriced and often unaffordable solutions. Large carriers would also have a strong incentive to withhold consent for the installation of wideband signal booster systems in order to disadvantage small competitive

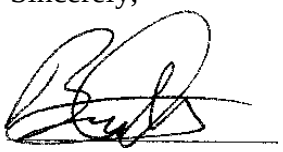
wireless carriers that may have less robust network resources and, as a result, could benefit the most from professionally provided signal booster solutions.

Further, a carrier consent requirement would be entirely unnecessary. Professionally provided enterprise signal booster systems have not been an appreciable source of harmful interference, and professional providers of such systems are very responsive to carriers in those rare occasions when concerns do arise.

It would be particularly illogical to impose carrier consent requirements on professionally provided enterprise signal boosters while avoiding such an unnecessary requirement for consumer signal boosters. In this regard, some of the parties to this proceeding have developed technical standards for consumer signal boosters that offer a safe harbor for boosters that are highly unlikely to cause harmful interference to wireless networks. Although Cellphone-Mate believes that certain of the technical standards in the safe harbor proposal are far more stringent than necessary, such as the intermodulation limits, Cellphone-Mate supports the adoption of the safe harbor requirements for consumer signal boosters as long as the Commission concludes that the safe harbor requirements eliminate any need for providers and/or users of consumer signal boosters to secure the consent of wireless carriers prior to their use. Given the fact that consumer signal boosters that satisfy the safe harbor requirements are highly unlikely to cause harmful interference to wireless networks, any carrier consent requirement would be unnecessary and would permit carriers to discourage consumers from using any signal connectivity solution that is not specifically endorsed and sold through the carrier's exclusive distribution channels.

Please contact the undersigned if you have any questions.

Sincerely,



Bruce A. Olcott